



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 24 1996

REPLY TO THE ATTENTION OF:

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dale Hanke, Vice President of Operations
Red Arrow Products Company Inc.
Post Office Box 1537
Manitowoc, Wisconsin 54221-1537

Re: Notice of Violation
Red Arrow Products Company, Inc.
Manitowoc, Wisconsin

Dear Mr. Hanke:

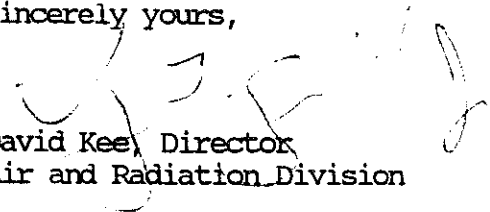
The enclosed Notice of Violation (NOV) is issued pursuant to Section 113(a)(1) of the Clean Air Act (the Act), 42 U.S.C. Section 7413(a)(1), as notification that the Administrator of the United States Environmental Protection Agency (U.S. EPA) finds Red Arrow Products Company Inc., Manitowoc, Wisconsin, to be in violation of the Wisconsin State Implementation Plan.

Section 113 of the Act provides U.S. EPA with several enforcement options. Those options include the issuance of an administrative order, the assessment of administrative penalties, or the commencement of civil or criminal actions. In addition, Section 120 of the Act provides for the assessment and collection of noncompliance penalties, and Section 306 of the Act, and as implemented by Executive Order 11738 and 40 C.F.R. Part 15, provides that facilities in noncompliance with the Act may become ineligible for Federal contracts, grants or loans. The enforcement options selected may be dependent, among other things, on the time required to achieve and demonstrate continuous compliance with the applicable rule cited in the enclosed NOV.

We are offering you an opportunity for a conference to discuss the violations which are the subject of the NOV. The conference will allow you an opportunity to present information bearing on the nature of the violations, and more importantly, any efforts you have made to achieve compliance, and on the steps you propose to take to comply with the regulations. You have the right to be represented by counsel at this conference.

The U.S. EPA contact in this matter is Peter B. Spyropoulos. Please contact Mr. Spyropoulos at (312) 886-6073, to request a conference. Such a request should be made as soon as possible, but no later than ten (10) days after receipt of this letter. Any conference must be held within thirty (30) days of your receipt of this letter.

Sincerely yours,

 FOR
David Kee, Director
Air and Radiation Division

Enclosure

cc: Don Theiler, Director
Bureau of Air Management
Wisconsin Department of Natural Resources

Mike DeBrock, District Air Leader
Lake Michigan District
Wisconsin Department of Natural Resources

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Red Arrow Products Company Inc.
1226 South Water Street
Manitowoc, Wisconsin

Notice of Violation
EPA-5-96-WI 10

PROCEEDINGS PURSUANT TO
SECTION 113(a)(1) OF THE
CLEAN AIR ACT,
42 U.S.C. § 7413(a)(1).

NOTICE OF VIOLATION

Pursuant to Section 113(a)(1) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(1), the State of Wisconsin and Red Arrow Products Company Inc., are hereby notified that the Administrator of the United States Environmental Protection Agency (U.S. EPA), by authority duly delegated to the undersigned, finds Red Arrow Products Company Inc., at 1226 South Water Street, Manitowoc, Wisconsin, in violation of Section 113(a) of the Act and the Wisconsin State Implementation Plan (SIP) adopted under the Act for exceedences of the visible emissions standard in NR 154.11(6)(a)1., "no person shall cause, suffer, allow or permit emissions into the ambient air from all direct or portable sources on which construction or modification is commenced after April 1, 1972, in excess of shade or density greater than 20% opacity..." (approved as part of the Wisconsin SIP on March 9, 1983, 48 Fed. Reg. 9860), as follows:

SUMMARY OF READINGS		
SAWDUST DRYER		
DATE	TIME	READING
July 13, 1995	09:51-09:57	43.3%
	09:57-10:03	59.2%
	10:03-10:09	55.9%
	10:09-10:15	59.2%
July 23, 1995	09:42-09:47	35.2%
	09:47-09:53	38.1%
	09:53-09:59	37.3%
	09:59-10:05	37.5%

7/24/96
Date


David Kee, Director
Air and Radiation Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 24 1996

REPLY TO THE ATTENTION OF:

(AE-17J)

Don Theiler, Director
Bureau of Air Management
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921
Madison, Wisconsin 53707

Re: Notice of Violation
Red Arrow Products Company, Inc.
Manitowoc, Wisconsin

Dear Mr. Theiler:

Enclosed is a copy of a Notice of Violation (NOV) issued this date by the United States Environmental Protection Agency (U.S. EPA) to Red Arrow Products Company Inc., for violations of the Wisconsin State Implementation Plan (SIP). This NOV has been issued pursuant to Section 113(a)(1) of the Act, 42 U.S.C. 7413(a)(1).

Specifically, Red Arrow Products' facility on South Water Street, Manitowoc, Wisconsin is in violation of Wisconsin SIP Rule NR 154.11(6)(a)1., Visible Emissions.

Section 113 of the Act provides U.S. EPA with several enforcement options including the issuance of an Administrative Order, an Administrative Penalty Order, or the commencement of civil or criminal actions. It is our hope that this Notice will substantially aid efforts to obtain compliance, thereby obviating the need for further Federal action.

Sincerely yours,


David Kee, Director
Air and Radiation Division

Enclosure

cc: Mike DeBrock, District Air Leader
Lake Michigan District
Wisconsin Department of Natural Resources